

## Listing of Company Comments and Division's Responses

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Mouser Kitchens, Inc.

I.D. #104-1600-0043

Log# F003

Several comments were received from Mr. Danny Hall of Mouser Kitchens during the public comment period. The first comments were received via fax on Jan 26, 1998.

Comment #1: Mouser Kitchens would like to keep weekly records instead of daily records as stated in their draft permit general condition #2. Danny Hall from the company said their software is designed for weekly tabulation and they would prefer to do it weekly.

Division response: The Division sees no problem with this request and thus their request will be honored.

Comment #2: Another request by the company, via the fax of January 26, 1998, was that they needed higher usage amounts than those listed on their existing permits and those in their Title V application. Division response: The Division will grant this request as no new requirements are triggered because of the higher usage amounts being allowed.

Another list of comments were received from Mr. Danny Hall on February 5, 1998.

Comment #1: The company is inquiring about the emission limitations with regard to opacity for the sanding booth (emission point 01) and the off-line booth (emission point 13). They specifically want to know who performs the opacity test(s) to determine compliance with state regulation 401 KAR 59:010, New process operations.

Division response: The regulation states in Section 3, that no person shall cause, suffer, allow or permit any continuous emission into the open air from a stack associated with any affected facility which is equal to or greater than twenty percent opacity. At the end of Section 2 of the regulation it discusses the definition of intermittent and continuous emissions and the techniques to be used to determine compliance with each emission type. The company is responsible for having an individual who is certified to read the opacity levels from appropriate stacks.

Comment #2: The company states that item 5.D(3) on page 11 of the permit should read "the VOC content, in lb VOC/lb solid, as applied," instead of ".....lb VHAP/lb solid,....."

Division response: Upon examination of the MACT standard in the CFR the item should not change. The listing....."lb VHAP/lb solids,...." is correct.

Comment #3: The company believes that 6 B. Under Specific Reporting Requirements (page 12 of the permit) is unclear as written in the permit.

Division response: This subpart in the permit references 40 CFR 63.803(l)(4) which discusses in detail under what situation(s) the increase should be reported to the permitting authority. The Division feels that this is sufficient.

Comment #4: The company states that there is no requirement for daily or weekly records of HAP's usage in the draft permit, although monthly records of HAP usage are required. Also, they're inquiring further whether daily or weekly HAP records are required in addition to daily VOC records? The company says that it is not clear whether submittal of reports is required monthly or quarterly and that they would like additional clarification on these issues.

Division's response: Mouser is referring to condition F.2. This general condition is for monitoring the emissions of VOC in order to insure that the classification of the source remains less than 250 tons per year. That is to keep the source in the synthetic minor category. The 250 tons per year or more of a regulated pollutant is the threshold level for the PSD category. VHAP's are tracked by the MACT standard and discussed elsewhere in the permit and in 40 CFR Parts 9 and 63. The Division has modified this general condition by clarifying the record keeping and reporting requirements in this general condition. The company is required to keep VOC weekly records which shall be summarized monthly and reported quarterly. The monthly VOC totals shall be used to calculate a 12 month rolling total in order to keep the company from being PSD.

In reference to the company's question: are daily or weekly HAP records required in addition to daily VOC records?

There are not any HAP records required to be kept as Mouser is not trying to stay below major source threshold levels for HAP's. However, as stated in the MACT, the permittee shall show continuous compliance with 40 CFR 63.804 (a)(1) by maintaining the results of the averaging calculation for each month and reporting the information within the semiannual period (six months) as required by 40 CFR 63.807(c).

In reference to the company's question: are reports required monthly or quarterly, please clarify? For the VOC's, as referred to in general condition F.2., revised weekly records of the VOC's are to be summarized monthly. At the end of each month the weekly records shall be summarized and tons per month of VOC recorded. And again, a 12 month rolling total to keep track of annual VOC totals. These monthly summaries of the VOC totals shall be sent to the Division quarterly.

Comment #5: The company would like additional clarification regarding the term “deviation from permit requirements” in Section F.5 and F.6. The company further states that they are unclear as to what constitutes “requirements” in these paragraphs and feel that these statements are extremely vague.

Division response: These general conditions were purposely written to place the regulatory and compliance responsibility on the company. General condition 5 discusses general monitoring and continuous or opacity emissions monitoring. All reports, regardless of the type of monitoring shall be certified by a responsible official of the company and additionally all deviations from any permit requirements shall be clearly identified in the reports. The Division also feels that General condition #6 is also adequately discussed and understandable.